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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

KLAMATH-SISKIYOU WILDLANDS
CENTER, OREGON WILD, CASCADIA
WILDLANDS, and SODA MOUNTAIN
WILDERNESS COUNCIL,

Plaintiffs,

vs.

UNITED STATES BUREAU OF LAND
MANAGEMENT,

Defendant.

Civ. Case No. 1:19-cv-02069-CL

**JOINT MOTION TO FURTHER STAY
PROCEEDINGS**

Plaintiffs and Federal Defendant Bureau of Land Management (BLM) jointly request a further 30-day stay in proceedings on Plaintiffs' Motion for Attorneys' Fees and Costs to allow them to attempt a negotiated resolution of this matter. On April 15, 2022, Plaintiffs submitted their Motion for Attorneys' Fees and Costs (ECF 65) and the parties requested a 45-day stay in proceedings (ECF 66). This Court granted the 45-day stay. ECF 67. The instant request to

further stay the proceedings is made to give Plaintiffs and Federal Defendant time to complete settlement discussions which, if successful, would minimize the need for additional briefing and involvement from this Court.

On or before the expiration of the 30-day requested stay, the Plaintiffs and Federal Defendant will either: (1) request a reasonable extension of the period in order to continue and possibly finalize settlement negotiations; (2) inform the Court that a settlement has been reached and file a stipulated settlement agreement; or (3) inform the Court that a stipulated agreement could not be reached and propose a briefing schedule for resolving Plaintiffs' motion. The briefing schedule proposed will include reasonable deadlines for Plaintiffs to file a renewed and updated motion, the Federal Defendants' response, and Plaintiffs' reply.

Date: May 31, 2022.

Respectfully submitted,

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